

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PETERSEN ENERGÍA INVERSORA, S.A.U. AND
PETERSEN ENERGÍA, S.A.U.,

Plaintiffs,

- against -

ARGENTINE REPUBLIC AND YPF, S.A.,

Defendants.

No. 15 Civ. 2739 (LAP)

ETON PARK CAPITAL MANAGEMENT, L.P., ETON
PARK MASTER FUND, LTD., AND ETON PARK
FUND, L.P.,

Plaintiffs,

- against -

ARGENTINE REPUBLIC AND YPF, S.A.,

Defendants.

No. 16 Civ. 8569 (LAP)

DECLARATION OF LAURA HARRIS

I, Laura Harris, hereby declare as follows:

1. I am a partner at the law firm of King & Spalding LLP, located at 1185 Avenue of the Americas, 34th Floor, New York, New York, 10036. I am an attorney representing Petersen Energía Inversora, S.A.U., Petersen Energía, S.A.U., Eton Park Capital Management, L.P., Eton Park Master Fund, Ltd., and Eton Park Fund, L.P., Plaintiffs in the above-captioned matter.

2. I respectfully submit this Declaration in support of Plaintiffs' letter to request a pre-motion conference regarding Plaintiffs' intended motion to compel YPF S.A. ("YPF"), and to place before the Court the following exhibits attached hereto.

3. Attached as **Exhibit A** is a true and correct copy of the Document Subpoena Plaintiffs served on YPF on March 25, 2024.

4. Attached as **Exhibit B** is a true and correct copy of YPF's Responses and Objections to Plaintiffs' March 25, 2024 Subpoenas dated April 8, 2024.

5. Attached as **Exhibit C** is a true and correct copy of YPF's 2023 20-F filed with the U.S. Securities and Exchange Commission on April 25, 2024.

6. Attached as **Exhibit D** is a certified translation of an article published in La Politica titled *YPF Moved to Lower the Price of the Local Barrel as a Contribution to the Price Hike* on October 25, 2023.

7. Attached as **Exhibit E** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8. Attached as **Exhibit F** is a Form 6-K filed by YPF with the U.S. Securities and Exchange Commission on March 6, 2024.

9. Attached as **Exhibit G** is a certified translation of an article titled *YPF's Balance Sheet: How It Fared in 2023 and What May Happen to Its Share Price* published in Forbes on March 7, 2024.

10. Attached as **Exhibit H** is a certified translation of a press release issued by the Government of Santa Cruz titled *Jaime Álvarez: We Ask YPF to Be Responsible In This Transfer So That the Province Can Reorganize* dated March 25, 2024.

11. Attached as **Exhibit I** is a certified translation of an article titled *With the Appointment of Federico Basualdo, Cristinism Unblocked a New Level of Politicization in YPF* published in EconoJournal on May 15, 2023.

12. Attached as **Exhibit J** is a certified translation of an article titled *La Cámpora, Among the Main Advertisers in the Country: Close to 8 Billion Pesos in Government Advertising Campaigns* published in ConverCom on July 17, 2022.

13. Attached as **Exhibit K** is a certified translation of an article titled *For Cristina Kirchner's Use of YPF's Airplanes, a Debt of \$200 Million Is Allegedly Owed* published in Perfil on January 18, 2024.

14. On March 25, 2024, Plaintiffs served a Document Subpoena on YPF containing 24 document production requests (the “Requests”). Ex. A. at 1. Requests 8 to 16 and Requests 18 to 21 sought documents related to whether YPF is currently an alter ego of the Republic. Ex. A. at 12–13.

15. On April 8, 2024, YPF issued its Responses and Objections to the Requests (“YPF’s Objections”). Ex. B. at 1. While YPF agreed to produce some documents responsive to Requests 1 to 3, 7, and 17, it refused to produce documents responsive Requests 8 to 16 and Requests 18 to 21. Ex. B. at 9–14.

16. On April 16, 2024, Plaintiffs’ counsel and YPF’s counsel met and conferred via video conference to discuss the Requests and YPF’s Objections. YPF’s counsel confirmed that YPF was unwilling to produce documents in response to Requests 8 to 16 and Requests 18 to 21. YPF’s counsel also stated that Plaintiffs needed to exhaust discovery from the Argentine Republic prior to seeking discovery from YPF. Plaintiffs’ counsel noted Plaintiffs’ disagreement with both of YPF’s positions.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 30, 2024.

/s/Laura Harris

Laura Harris